

## STATE OF VERMONT

SUPERIOR COURT

Washington Unit

CIVIL DIVISION

Docket No. 22-CV-01557Ronald Gagne  
Plaintiff

v.

State of Vermont, Commissioner, Vermont  
Department of Corrections, and, Superintendent,  
TCCF-Correctional by and thru C.T. Corp  
(Name of facility) Suttonville, VTVT Superior Court  
Washington Civil

APR 21 2022

FILED

COMPLAINT FOR REVIEW OF GOVERNMENTAL ACTION

NOW COMES Ronald Gagne, Petitioner, Pro-Se and pursuant to Rule 75, of the Vermont Rules of Civil procedure, hereby moves the Honorable Court for review of governmental action.

In support thereof, Petitioner puts forth the following facts that entitle Petitioner to relief.

FACTS

- Petitioner is a (prisoner/detainer) prisoner currently committed to the care and custody of Nicholas Deml, Commissioner of the Vermont Department of Corrections,
- Petitioner currently resides at the (correctional facility name) Tallahatchie County Correctional Facility in (city, state) Itawamba, Mississippi 38963
- On or about 06/30/2021 Petitioner submitted a VT DOC GRIEVANCE FORM #1 (INFORMAL COMPLAINT & PLAN FOR RESOLUTION FORM) to: L. Lewis  
See; Exhibit 1.
- The substance of the Grievance was: Trinity Services Group dis-  
criminate against Jewish inmates.  
Inmates of all sects of Christianity, Native Americans,  
Muslims and all other inmates are given meat in  
their meals. However Jewish inmates are  
forced to be vegetarians. Kosher doesn't mean  
Jewish people don't eat meat. No a vegetarian diet  
is a choice and is not a Medical Diet either.  
Every inmate except Jewish inmates are given  
meat. No Trinity Services Group discriminates

against Jewish inmates by denying them meat and forcing a vegetarian diet on them.

5. IF YOU ARE NOT SATISFIED WITH RESPONSE ENTER THE RESPONSE WAS UNSATISFACTORY" HERE. OR IF YOU DO NOT GET A RESPONSE ENTER THAT "[NAME OF PERSON YOU GRIEVED] FAILED TO RESPOND" HERE (THE INFORMAL RESPONSE MUST BE RETURNED WITHIN 58 HOURS. IF NOT, THAT IS THE RESPONSE AND YOU MAY CONTINUE ON TO THE FORMAL GRIEVANCE #2).

No Response Grieved Trinity Services Group  
See; Exhibit 1.

6. On or about 07/03/2021, Petitioner submitted a VT DOC GRIEVANCE FORM #2, (OFFENDER/INMATE GRIEVANCE SUBMISSION FORM) to: \_\_\_\_\_

L. Lewis  
See; Exhibit 2.

7. IF YOU ARE NOT SATISFIED WITH RESPONSE ENTER THE RESPONSE WAS UNSATISFACTORY" HERE. OR IF YOU DO NOT GET A RESPONSE ENTER THAT "[NAME OF PERSON YOU GRIEVED] FAILED TO RESPOND" HERE (THE RESPONSE MUST BE RETURNED WITHIN 20 DAYS. IF NOT, THAT IS THE RESPONSE AND YOU MAY CONTINUE ON TO THE APPEAL TO THE CORRECTIONS EXECUTIVE (GRIEVANCE #5).

No Response Grieved Trinity Services Group  
See; Exhibit \_\_\_\_\_.

8. On or about 08/02/2021, Petitioner submitted a VT DOC GRIEVANCE FORM #5, (DECISION APPEAL TO CORRECTIONS EXECUTIVE) to the following Corrections Executive: \_\_\_\_\_

See; Exhibit 3.

9. IF YOU ARE NOT SATISFIED WITH RESPONSE ENTER "THE RESPONSE WAS UNSATISFACTORY" HERE. IF THE CORRECTIONS EXECUTIVE FAILED TO RESPOND ENTER "THE CORRECTIONS EXECUTIVE FAILED TO RESPOND" HERE. (THE RESPONSE MUST BE RETURNED WITHIN 20 DAYS. IF NOT, THAT IS THE RESPONSE AND YOU MAY CONTINUE ON TO THE APPEAL TO THE COMMISSIONER (GRIEVANCE #7).

See; Exhibit Corrections Executive Failed To Respond.

10. On or about 09/06/2021, Petitioner submitted a VT DOC GRIEVANCE FORM #7, (DECISION APPEAL TO COMMISSIONER) to Respondent.

See; Exhibit 4.

11. IF YOU ARE NOT SATISFIED WITH RESPONSE ENTER "THE RESPONSE WAS UNSATISFACTORY". IF THE COMMISSIONER FAILS TO RESPOND ENTER "THE COMMISSIONER FAILED TO RESPOND" HERE. (THE RESPONSE MUST BE RETURNED WITHIN 20 DAYS. IF NOT, THAT IS THE RESPONSE AND YOU HAVE EXHAUSTED YOUR ADMINISTRATIVE REMEDIES AND CAN NOW FILE THIS PETITION)

Commissioner Failed To Respond.  
See; Exhibit \_\_\_\_\_.

12. Petitioner has exhausted all administrative remedies available.

13. This Petition followed.

#### RELIEF SOUGHT

WHEREFORE, for all of the foregoing reasons the Petitioner prays that this Honorable Court will:

1. Accept jurisdiction over this matter, and;
2. Assign counsel to assist Petitioner in presenting this Petition, and;
3. Grant leave to amend, and;

# Argument

Trinity Services Group could not even be bothered enough by their blatant, and obvious discrimination against Jewish inmates.

So because I am Jewish I am not allowed meat? Yet all other religions are allowed to eat meat.

A vegetarian diet is a choice. It is not a Medical diet, it is a choice.

Trinity Services Group discriminates against Jewish inmates. Denying me meat and forcing me, a Jewish inmate, to be a vegetarian.

Trinity Services Group cannot discriminate against me because I am Jewish and deny me meat. So as a Jewish inmate I'm not worthy of the same that all other religious inmates get?

4. Set this matter for a hearing on the issues presented herein, and;
5. Grant this Petition, and;
6. Order all other relief in the interest of justice.

RESPECTFULLY SUBMITTED this 15<sup>th</sup> day of April, 2022

Ronald Gagne aka Kalamu Gagne  
Signature

# Exhibit 1

## VT DOC GRIEVANCE FORM #1 TCCF Tallahatchie County CF

## INFORMAL COMPLAINT &amp; PLAN FOR RESOLUTION FORM

Facility: TCCF

Field Office:

Offender/Inmate Name: Ronald Gagne  
(print name)

DOB: 03/11/60

Issue/Complaint:

intended discrimination against Jews. Jews here at TCCF/CCA are forced to be vegetarians. All sects of Christianity, Atheists, Muslims, whatever religious affiliation are served meat in their diet. Jews are denied meat. WHY? How can you force only Jews to be vegetarians?

Proposed Solution:

Stop the discrimination and persecution of Jews. The Jewish population only religion being denied meat.

Received by:

C. LUKS / S. K...  
Correctional Staff (Printed Name & Signature)

Date:

Time:

6/30/21 07/22/21

Plan for Resolution:

Responding Staff:

Date:

Time:

Correctional Staff (Printed Name &amp; Signature)

I agree to the Plan for Resolution: Yes ☐ No ☐

Offender/Inmate Signature:

Date:

Time:

I agree to the Plan for Resolution: Yes ☐ No ☐

Cc: 2 copies Offender/Inmate, 1 copy Grievance Coordinator after data entry to Offender/Inmate Core File.

## **Exhibit 2**

## VT DOC GRIEVANCE FORM #2 TCCF (page 1)

## OFFENDER/INMATE GRIEVANCE SUBMISSION FORM

Facility: TCCF

Field Office:

Offender/Inmate Name: Ronald G. Lewis "Victim" DOB: 03-11-66Date Grievance Submitted: 6.17.21Living Unit: MA-830Did you file an informal complaint about this issue? Yes ☒ No ☐If so, with whom? cc LewisWhat date? 06-30-21The Informal Complaint/Plan for Resolution Form (Grievance Form #1) is attached: Yes ☒

State your grievance, including the names of any witnesses (who, what, when, where):

Trinity Services Group discriminates against Jewish inmates. All sects of Christianity, Muslims, Atheists, Native Americans etc. and general population all receive meat in their meals. Jewish inmates are denied meat and are given soy protein for all lunches and dinners with exception of two days per week (3 meals). Jewish people are not all vegetarians therefore should not be forced into a diet for the reason of Trinity Services trying to save money on cost of Kosher meals. Only

What do you think the outcome of this grievance should be and why?

Stop the discrimination and persecutions of Jewish inmates. Serve meat to Jewish inmates.

If going to offer meat to rest of population the Jewish inmates must receive meat or do not allow meat to any religion or general population. Trinity shows their intent for Jews without even answering grievances.

Staff Person receiving this grievance:

(Printed Name &amp; Signature)

Date received:

Rev. 11.06

(over)

Jewish inmates are forced to be vegetarians.



## **Exhibit 3**

## VT DOC GRIEVANCE FORM #5 TCCF

## DECISION APPEAL TO CORRECTIONS EXECUTIVE

This form may be used to file an appeal of a grievance decision to the appropriate Corrections Executive. Please check the title of the one Executive to whom you are appealing below:

☐ Facilities Executive

☐ Director Health Services

☐ Field Services Executive

☐ Program Services Executive

☐ Community & Restorative Justice Executive

☐ Director of Classification

Attach all previous DOC decisions and any other documentation. State briefly why you are not satisfied with the Superintendent/District Manager/OOS Supplemental Housing Manager's response to your grievance which was dated: 07-08-21

The Kitchen Unit has to consider grievances #1 & #2!  
 Trial services brown continually discriminates against Jewish inmates. As stated in both #1 & #2, forces Jewish inmates to be vegetarians. All sorts of 'Christianity' Muslims, Native Americans or whatever religious affiliation receive meat in their diets. However Jewish inmates are only given soy protein.

Also all sorts of Christianized Muslims, Native Americans, etc. also receive a special meal for July 4th and Thanksgiving. However Jewish inmates receive same meal as usual on those two holidays. Discrimination Jewish American inmates celebrate the 4th of July and Thanksgiving.

Signature of Offender/Inmate: Ronald Grime "Kalam" (Use back if necessary.)  
 Print Name & DOB: Ronald Grime 03-11-66

 Facility: KCF

Field Office:

 Date Appeal Submitted: 03-02-21

Mail to: Department Hearings Administrator, NOB 2 South, 280 State Drive, Waterbury, Vermont 05671-2000

Cc: Offender/Inmate, Hearings Administrator

11.06

## **Exhibit 4**

## VT DOC GRIEVANCE FORM #7 TCCF

## DECISION APPEAL TO COMMISSIONER

Facility:

Field Office:

This form may be used to file an appeal of a Department Executive's grievance decision to the Commissioner of Corrections. **Attach all previous DOC decisions and any other documentation.**

State briefly why you are not satisfied with the response to your grievance appeal from the Corrections Executive which was dated: no response filed #5 on 08-02-21

Trinitat Services Group (TSG) discriminates against Jewish inmates. Jewish inmates are forced to be vegetarians. All sorts of Christians, Muslims, Native Americans and all other religions are given meat in their diet. A vegetarian diet is a choice, a preference, not a diet to be forced upon the Jewish faith. No that is discrimination against the Jewish inmates.

Also all sorts of Christians, Muslims, Native Americans and other religious holidays are given a special meal on July 4th and Thanksgiving. Jewish Americans celebrate the 4th of July & the Thanksgiving holidays.

Yet just another way TSG discriminates against the Jewish inmates.

Ronald Gagne  
Signature of offender/inmate

Ronald Gagne 03-11-66 "Kalanni"  
Print name & DOB

Date appeal submitted: 09-06-21

Mail to the appropriate Corrections Executive at: NOB 2 South, 280 State Drive, Waterbury, Vermont 05671-2000

Mail a copy to: Department Hearings Administrator, NOB 2 South, 280 State Drive, Waterbury, Vermont 05671-2000

Cc: Offender/Inmate, Offender/Inmate Core File, Grievance Coordinator

11.06

STATE OF VERMONT

SUPERIOR COURT

Unit

CIVIL DIVISION

Docket No.

<small>Plaintiff</small> Ronald Gagne aka Kalani Gagne	<small>Defendant</small> State of Vermont et al/Corrections
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WAIVER OF SERVICE OF SUMMONS

To: \_\_\_\_\_  
(Name of Unrepresented Plaintiff or Plaintiff's Attorney)

I received your request to waive service of the summons. I also received the **Complaint**, two copies of this **Waiver of Service of Summons** form, and a way to return this form to you at no cost to me.

I (or my client) agree to save you the cost of serving the Summons and Complaint.

I understand that by signing this waiver I (or my client) cannot object to how this lawsuit was served. However, I can still defend myself against the claims you are making and bring counterclaims against you.

I understand that within 60 days of the date you sent me this waiver form (90 days if the form was sent outside the United States), I (or my client) must provide you and the Court a written response (**Answer**), as required by the Vermont Rules of Civil Procedure (see e.g. Rules 8, 12 and 13). If I do not meet this deadline, the Court may decide the case against me.

I (or my attorney) also will fill out the **Notice of Appearance** form and send it to you and the Court.

Dated

\_\_\_\_\_

\_\_\_\_\_  
Signature of Attorney or Unrepresented Defendant

\_\_\_\_\_  
Printed Name of Defendant Waiving Service

DUTY TO AVOID UNNECESSARY COSTS OF SERVICE OF SUMMONS (V.R.C.P. Rule 4)

If Plaintiff and Defendant are both in the United States, Defendant must pay the costs to serve the Summons and Complaint if Defendant does not return the Waiver of Service of Summons form within the time allowed by Plaintiff (which must be at least 30 days from when the request was sent), unless Defendant shows good cause. Defendant's belief that the Complaint is groundless or that the action has been brought in the wrong place or that the Court lacks jurisdiction is not good cause.

## STATE OF VERMONT

SUPERIOR COURT

Unit

CIVIL DIVISION

Docket No.

Plaintiff	vs.	Defendant
Ronald Babiné aka Kalanni Babiné		State of Vermont et al / Core Circle

## WAIVER OF SERVICE OF SUMMONS

To: \_\_\_\_\_  
 (Name of Unrepresented Plaintiff or Plaintiff's Attorney)

I received your request to waive service of the summons. I also received the **Complaint**, two copies of this **Waiver of Service of Summons** form, and a way to return this form to you at no cost to me.

I (or my client) agree to save you the cost of serving the Summons and Complaint.

I understand that by signing this waiver I (or my client) cannot object to how this lawsuit was served. However, I can still defend myself against the claims you are making and bring counterclaims against you.

I understand that within 60 days of the date you sent me this waiver form (90 days if the form was sent outside the United States), I (or my client) must provide you and the Court a written response (Answer), as required by the Vermont Rules of Civil Procedure (see e.g. Rules 8, 12 and 13). If I do not meet this deadline, the Court may decide the case against me.

I (or my attorney) also will fill out the **Notice of Appearance** form and send it to you and the Court.

Dated \_\_\_\_\_

\_\_\_\_\_  
 Signature of Attorney or Unrepresented Defendant

\_\_\_\_\_  
 Printed Name of Defendant Waiving Service

## DUTY TO AVOID UNNECESSARY COSTS OF SERVICE OF SUMMONS (V.R.C.P. Rule 4)

If Plaintiff and Defendant are both in the United States, Defendant must pay the costs to serve the Summons and Complaint if Defendant does not return the Waiver of Service of Summons form within the time allowed by Plaintiff (which must be at least 30 days from when the request was sent), unless Defendant shows good cause. Defendant's belief that the Complaint is groundless or that the action has been brought in the wrong place or that the Court lacks jurisdiction is not good cause.

## STATE OF VERMONT

SUPERIOR COURT

CIVIL DIVISION

Unit

Docket No.

<i>Plaintiff</i> Ronald Gagné aka Kalanni Gagné	vs.	<i>Defendant</i> State of Vermont et al / corecivic
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## NOTICE OF LAWSUIT &amp; REQUEST FOR WAIVER OF SERVICE OF SUMMONS

To: State of Vermont  
 (Name of Unrepresented Defendant or Defendant's Attorney)

I (or my client) have started a lawsuit against you. I enclose a copy of the **Complaint**, two copies of the **Waiver of Service of Summons** form, and a **Notice of Appearance** form.

This is not a formal summons or notification from the Court. To save the cost of having a sheriff or constable deliver these papers to you, I am asking you to **sign and date** the Waiver of Service form and return it to me in the enclosed addressed & stamped envelope or email it to me at \_\_\_\_\_. Keep the other Waiver of Service form and Complaint.

If you return the signed and dated Waiver of Service of Summons form by 05.17.22 (date must be at least 30 days from the day this request was sent to you, if sent within the United States; at least 42 days if sent outside the United States), you will not have to pay to have the sheriff or constable deliver the summons. I will send your Waiver of Service form to the Court and the lawsuit will move forward. You will not be able to object to how this lawsuit was served on you, but you can still defend yourself and make counterclaims.

If you return the Waiver of Service of Summons form by 05.17.22, then you must provide me and the Court a written response (Answer) to the Complaint (including any counterclaims), as required by the Vermont Rules of Civil Procedure (see e.g. Rules 8, 12 and 13) within 60 days of the date I sent you this Waiver form (90 days if the form was sent outside the United States). **IF YOU DO NOT MEET THIS DEADLINE, THE COURT MAY DECIDE THE CASE AGAINST YOU.** Please review the attached **Important Information for Defendants**. You should also fill out the **Notice of Appearance** form and send it with your written response to the Complaint.

If you do not return the signed and dated Waiver of Service of Summons form by 05.17.22, I will ask a sheriff or constable to serve you with a summons and I will ask the Court to require you to pay the costs.

I affirm that this request is being sent to you on 04.15.22.

Ronald Gagné aka Kalanni Gagné  
 Signature Plaintiff or Plaintiff's Attorney

## STATE OF VERMONT

SUPERIOR COURT

DIVISION

Unit

Docket No.: \_\_\_\_\_

Plaintiff(s) <u>Ronald Gagne aka Kalamni Gagne</u>	VS.	Defendant(s) <u>State Of Vermont / C.T. Corporation (Covered)</u>
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**NOTICE OF APPEARANCE  
For Self-Represented Litigant**

I am the: ☒ Plaintiff ☐ Defendant in this case.

I will represent myself and, in addition to filing the required answer, I hereby enter my appearance with the court. If I decide to be represented by an attorney in the future, either my attorney or I will notify the court of the change.

In representing myself, I understand that I **MUST**:

1. Notify the court in writing of any changes in my address, phone number, or email address.
2. Give or send copies of any papers I file with the court to every other party in this case. If another party has an attorney, I will give or send copies to that party's attorney.
3. File a certificate of service with the court swearing that I have sent the papers I am filing to all parties. I understand that I can find that form on the Vermont Judiciary website or at the court house.

All court papers may be mailed to me by first class mail at the address listed below.

My Street Address			My Mailing Address (if different)		
Name <u>Ronald Gagne aka Kalamni Gagne # 806</u>			Name		
Address <u>5507 700 Charlestown Road</u>			Address		
Town/City <u>Springfield, VT</u>	State	Zip <u>05150</u>	Town/City	State	Zip
Phone Number (day)			Phone Number (day)		
Email Address			Email Address		

Dated

04-15-22

Signature

Ronald Gagne aka Kalamni Gagne

Printed Name

Ronald Gagne aka Kalamni Gagne



**SUPERIOR COURT**

**STATE OF VERMONT**

**CIVIL DIVISION**

**Unit**

**Docket No.**

Ronald Gagné aka Kalanni Gagné vs. State Of Vermont : C.T. Corporation (Core civic)

**CERTIFICATE OF SERVICE**

I, Ronald Gagné aka Kalanni Gagné certify that on 01-15-22  
copy of the (check applicable document) to each of the parties in this case:

I mailed by first class mail a

**SUMMONS AND COMPLAINT:**

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> Summons                           | <input type="checkbox"/> Information and Instructions for the Defendant |
| <input type="checkbox"/> Complaint                                    | <input type="checkbox"/> Blank Answer form                              |
| <input checked="" type="checkbox"/> Document(s) attached to Complaint |   |

**DEFAULT:**

- ☐ Motion for Default Judgment and Affidavit dated
- ☐ Credit Card Documentation attached to Motion for Default Judgment
- ☐ Default Judgment dated

**POST-JUDGMENT:**

- ☐ Motion for Financial Disclosure
- ☐ Financial Disclosure Order dated
- ☐ Motion for Trustee Process Hearing on the defendant
- ☐ List of Exemptions

**APPEAL:**

- ☐ Notice of Appeal dated
- ☐ Request for Permission to Appeal to the Supreme Court

**OTHER:**

- ☐ Describe:

Signature: Ronald Gagné aka Kalanni Gagné Name (print or type) Ronald Gagné aka Kalanni Gagné

Date: 01-15-22

T.J. Donovan AG  
Vermont Attorney General  
109 State Street  
Montpelier, VT 05609

C.T. Corporation (Core civic)  
17 GW Tatro Drive  
Jeffersonville, VT 05464

VT Superior Court  
Washington Civil

APR 21 2022

April 15, 2022

FILED

To Whom It May Concern,

I am writing this letter in regards to my filing of this rule 75. I was packed up to leave CCA/TCCF on Monday March 14, 2022.

All my legal paperwork therefore was packed up. So I was unable to take care of all that I needed to. I left CCA/TCCF on Monday March 21, 2022. I arrived at SSCF on Tuesday March 22, 2022.

I was quarantined upon arrival due to Covid protocol. I was released from quarantine on Thursday April 07, 2022.

I had repeatedly requested (written) and orally asked for my legal work so as I could file my rule 75. However it fell upon deaf ears.

So I apologize if it is late. I'm not sure. However it

April 15, 2022

is not due to me.

Once again I express how all involved: VT DOC, State Of Vermont, CCA/TCCF are continually making all efforts to derail my rule 75's and hide all the discrimination, harassment, retaliation and hate that has done to me by all the above mentioned. As well as Rick Burnes, Dave Turner, Corey Stone: VT DOC Commissioner Nicholas Dieml and the entire Correctional System.

Sincerely,

Ronald Gagné aka Kalamni Gagné

Ronald Gagné aka Kalamni Gagné